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Attorneys for Defendants
Jiangmen Jianxin Trading Co., Ltd,
Guangzhou Chwares E-Business Co., Ltd, and
Jiangmen Yongkeng Electric & Hardware Co.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

FELLOW INDUSTRIES, INC., a Delaware
limited liability corporation,

Plaintiff,

v.

TURLYN INTERNATIONAL, INC., a
California corporation; GUANGZHOU
HAIER INFORMATION TECHNOLOGY
CO. LTD., a Chinese entity; GUANGZHOU
HAIER GLOBAL TRADING CO. LTD, a
Chinese entity; HAIER AMERICA
TRADING, LLC, a New Jersey limited
liability company; LTMATE GLOBAL INC.,
a California corporation; JIANGMEN
JIANXIN TRADING CO., LTD., a Chinese
entity; JIANGMEN YONGKENG ELECTRIC
& HARDWARE CO., a Chinese entity;
GUANGZHOU CHWARES E-BUSINESS
CO., LTD., a Chinese entity; ROYALUX,
INC., a New York corporation; and DOES 1-
5,

Defendants.

Case No. 5:23-cv-02270-BLF

**JOINT STIPULATION TO
EXTEND CERTAIN
DEFENDANTS' DEADLINES
TO RESPOND TO JURISDICTIONAL
DISCOVERY AND
RELATED DEADLINES**

Defendants Jiangmen Jianxin Trading Co., Ltd (“JJTC”), Guangzhou Chwares E-Business Co., Ltd (“GCEC”), Jiangmen Yongkeng Electric & Hardware Co. (“JYEHCo,” together with JJTC and GCEC, the “Chinese Defendants”) and Plaintiff Fellow Industries, Inc. (“Plaintiff”, together with the Chinese Defendants, “the Parties”), by and through their respective counsel of record, and pursuant to Local Rule 6-2, jointly stipulate as follows:

WHEREAS, on November 29, 2023, the Court granted Plaintiff’s Motion for Expedited and Limited Jurisdictional Discovery from Chinese Defendants [ECF 64];

WHEREAS, Plaintiff served Chinese Defendants with Discovery Requests on December 14, 2024;

WHEREAS, Chinese Defendants have a deadline of January 26, 2024 to provide written responses and objections to the Discovery Requests and provide a production of documents to Plaintiff;

WHEREAS, the Parties have a deadline of February 16, 2024 to complete depositions;

WHEREAS, due to the upcoming Chinese New Year holiday, the Parties have stipulated and agreed to an extension of the deadlines related to jurisdictional discovery;

WHEREAS, there has not been any prior requests for an extension of time to complete jurisdictional discovery and this request is not being sought for any improper purpose;

WHEREAS, extending the deadlines for jurisdictional discovery would not impact any other deadlines in the case; and

WHEREAS, the filing attorney hereby attests that they have obtained concurrence regarding the filing of this document from each of the other signatories to this document and each signatory has authorized the filing.

NOW, THEREFORE, the Parties hereby stipulate and agree to have the Jurisdictional
Discovery deadlines extended as follows:

| | <u>Current Date</u> | <u>Proposed Date</u> |
|---|---------------------|----------------------|
| <u>Response to Jurisdictional Discovery</u> | 1/26/2024 | 3/1/2024 |
| <u>Deadline to provide dates and times for each 30(b)(6) deposition</u> | | 2/10/2024 |
| <u>Deadline to complete depositions</u> | 2/16/2024 | 3/15/2024 |

January 26, 2024

RESPECTFULLY SUBMITTED,

/s/ Andrew D. Bochner
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January 26, 2024

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